

Message

From: Rosalie Winn [rwinn@edf.org]
Sent: 5/23/2019 3:13:46 AM
To: Cozzie, David [Cozzie.David@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]
CC: Peter Zalzal [pzalzal@edf.org]
Subject: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration, 83 Fed. Reg. 52,056, Docket No. EPA-HQ-OAR-2017-0483
Attachments: Appendix G productionBins_and_available_site_level_data.xlsx; Estimating_%_Fugitive_Emissions.docx; Appendix E NSPS Subpart OOOOa compliance reports FOIA.xlsx; EDF Blog NOAA Study.pdf

Good evening,

We write to submit supplemental information in response to questions raised concerning comments submitted by the Environmental Defense Fund on EPA's rulemaking regarding *Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Reconsideration*, 83 Fed. Reg. 52,056 (Oct. 15, 2018), Docket No. EPA-HQ-OAR-2017-0483.

- Additional data on specific wellsites included in Appendix G, Omara, *A Technical Assessment of the Foregone CH₄ Emissions Reductions*.
- Additional detail on the approach to calculating the percentage of fugitive emissions in Appendix G, and corroborating information from the Greenhouse Gas Inventory.
- Additional data supporting Appendix E, MJ Bradley, *Well Site Compliance Reports Memo*, which was inadvertently omitted from EDF's attachments to comments.
- A blog post by David Lyon and Stephan Schwietzke clarifying the results of a new study published this week in the journal *Geophysical Research Letters*.

Best,
Rosalie

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